

Juror Name: _____ Juror Number: _____

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JUROR QUESTIONNAIRE

TO THE PROSPECTIVE JUROR:

The information that you provide in this questionnaire will be used by the Court and the parties to select a qualified jury for this case; that is, a jury that can render a verdict fairly and impartially based upon the evidence offered at trial in accordance with the law as instructed by the Judge. All parties in this trial are entitled to a fair and impartial jury.

It is very important that you answer these questions as fully, honestly, and accurately as you can; you have sworn an oath to do so. There are no right or wrong answers; only complete and incomplete answers. Your complete candor and honesty is necessary so that both the prosecution and the defense will have a meaningful opportunity to select an impartial jury.

Please keep the following instructions in mind:

- You are instructed not to discuss this case or this questionnaire with anyone, including your family and fellow jurors.
- If you are unable to answer a question because you do not understand it, please write “Do not understand” in response to that question. Do not ask anyone, including court personnel, for clarification or assistance.
- If you are unable to answer a question because you do not know the answer, please write “Do not know” in response to that question.
- If you are unable to answer a question because it does not apply to you, please write “N/A” (which stands for “not applicable”) in response to that question.
- If you prefer not to answer a question because of the private nature of your response, write “Private” after each question. At a later date, the court may inquire about the topic privately.
- If you require additional space for your responses, or wish to make further comments regarding any of your answers, please use the Explanation Sheet (on the last page). Put the number of the question you are answering before you write the response or comment.
- Unless the question states otherwise, the fact that a particular question is asked does not imply that the subject matter of that question pertains to this case. As you read the questions, you are not to draw any inferences about the issues to be decided in this case.

- After you have completed this questionnaire, you are instructed not to discuss any of the questions or your answers on this questionnaire with anyone, including members of your family, co-workers, or other potential jurors. If anyone approaches you and attempts to discuss any aspect of this questionnaire, the jury selection process, or any aspect of this case, you are not permitted to answer their questions.

At the end of the questionnaire, please sign it, affirming the truth of your answers and the fact that you have given them without assistance.

PLEASE PRINT LEGIBLY AND USE ONLY DARK INK

1. Name _____ Juror Number:

2. Age:

Date of Birth:

State and City of Birth:

Gender:

3. Current Address:

(City) (State) (Zip Code)

4. How long have you lived at that location? _____

5. Please list any other communities in which you have lived in the past ten years:

6. Please list your parents' occupations: (If retired/deceased, list most recent occupation)

Mother: _____

Father: _____

Stepmother: _____

Stepfather: _____

7. What is the highest level of education you have completed?

Grade school or less _____

Some high school _____

High school diploma or GED _____

Technical or business school _____

Some college _____

College degree _____

Graduate or Professional degree _____ (specify):

8. Are you presently a student?

Yes _____ No _____

If yes, describe course of study and anticipated date of completion:

9. Please list any jobs you have had in the past ten (10) years, starting with the most recent job and describe what you did at each job:

<u>Job Title</u>	<u>Employer</u>	<u>Job Duties</u>	<u>Dates worked</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

10. If you are not currently employed outside the home, please check the category below that applies to your employment status:

☐ Homemaker
☐ Retired (If retired, what was your primary occupation?): _____
☐ Unemployed – currently looking for work
☐ Unemployed – not currently looking for work
☐ Student
☐ Disabled
☐ Other (please explain): _____

11. Have you ever had management or supervisory responsibility on your job or started or owned your own business?

Yes _____ No _____

If yes, please explain:

12. Marital status: Married _____ Single _____ Separated _____
 Divorced _____ Widowed _____
 Civil union/domestic partner _____

13. Spouse/partner/significant other:

Name:

Occupation:

Employer:

14. Please check the highest level of education your spouse/partner/significant other has completed. If widowed, divorced or separated, please answer regarding your late or former spouse/partner.

Grade school or less _____
 Some high school _____
 High school diploma or GED _____
 Technical or business school _____
 Some college _____
 College degree _____
 Graduate or Professional degree _____ (specify):

15. Do you have children or grandchildren? If so, please list the following information for each:

<u>Gender</u>	<u>Age</u>	<u>Live with you?</u>	<u>Post-high school education</u> (specify degree and school)	<u>Occupation</u>
_____	_____	Yes / No	_____	_____
_____	_____	Yes / No	_____	_____
_____	_____	Yes / No	_____	_____
_____	_____	Yes / No	_____	_____
_____	_____	Yes / No	_____	_____

16. What newspaper(s), magazine(s), or websites do you read regularly?

17. Please list any internet social networking websites that you use and/or have an account with (MySpace, Facebook, LinkedIn, Twitter, Tumblr, Instagram, or any similar sites):

18. Have you had prior jury trial service?

Yes _____ No _____

If your answer is yes, please answer the following:

Which type of jury service was it?

Criminal _____ Civil _____ Both _____

Did the jury reach a verdict in each case above?

Yes _____ No _____

Is there anything about your prior jury service that might affect your ability to be fair and impartial in this case?

Yes _____ No _____

If yes, please explain:

19. Are you currently taking any medications that might interfere with your ability to concentrate?

Yes _____ No _____

If yes, please explain:

20. Is there any reason relating to the COVID-19 pandemic that would make your jury service an undue hardship for you or anyone in your household?

Yes _____ No _____

If yes, please explain:

21. Do you have any personal or business affairs that would make it difficult for you to serve as a juror (the trial is expected to last for approximately 4 weeks)?

Yes _____ No _____

If yes, please explain:

22. Do you have any personal or family responsibilities (such as caring for a young child or ill or elderly person) that would interfere with your service as a juror?

Yes _____ No _____

If yes, please explain:

23. The prosecution has the burden of proving that the defendant is guilty beyond a reasonable doubt. A defendant does not have to prove that he is innocent. Do you disagree in any way with this principle?

Yes _____ No _____

If yes, please explain:

24. Have you, a relative, a close friend, and/or anyone you live with ever been employed in law enforcement?

Yes _____ No _____

If yes, please identify the law enforcement agency:

25. Have you, a relative, a close friend, and/or anyone you live with ever been employed by the court system?

Yes _____ No _____

If yes, please identify the position and location:

26. Have you, a relative, a close friend, and/or anyone you live with ever worked for a United States Attorney's Office, a State or Local Prosecutor's Office, the FBI, or the IRS?

Yes _____ No _____

If yes, for each such person, please list in what office the person works or worked, and what your relationship is to that person.

Office Worked In

Relationship

27. Have you, a relative, a close friend, and/or anyone you live with ever worked for a criminal defense attorney or public defender?

Yes _____ No _____

If yes, for each such person, please list in what office the person works or worked, and what your relationship is to that person.

Office Worked In

Relationship

28. The jurors in this case will be instructed that the testimony of a law enforcement officer is to be treated the same as the testimony of anyone else. Do you have any concerns about your ability to follow this instruction?

Yes _____ No _____

If yes, please explain:

29. Have you, a relative, a close friend, and/or anyone you live with ever been the victim of a crime?

Yes _____ No _____

If yes, please explain:

30. Have you, a relative, a close friend, and/or anyone you live with ever been a witness to a crime?

Yes _____ No _____

If yes, please explain:

31. Have you, a relative, a close friend, and/or anyone you live with ever been arrested for, charged with, or convicted of an offense other than a simple traffic violation?

Yes _____ No _____

If yes, what was the crime?

Was it a felony or misdemeanor?

What punishment did you (or someone else) receive (including probation)?

32. In this case, defendants are being represented by Brian Kelly, Joshua Sharp, and Lauren Maynard of Nixon Peabody LLP; Michael Kendall, Lauren Papenhausen, and Yan Chu of White & Case LLP; Andrew Tomback of McLaughlin & Stern, LLP; and Robert Sheketoff. Do you know any of these attorneys?

Yes _____ No _____

If yes, please describe who you know and how you know them.

33. Do you know any other employees who are associated with the law firms Nixon Peabody LLP, White & Case LLP, or McLaughlin & Stern, LLP?

Yes _____ No _____

If yes, please describe who you know and how you know them.

34. In this case, the government is or has been represented by Assistant United States Attorneys Stephen Frank, Justin O'Connell, Leslie Wright, Kristen Kearney, Ian Stearns, and Eric Rosen. Do you know any of these attorneys?

Yes _____ No _____

If yes, please describe who you know and how you know them.

35. The defendants in this case are Gamal Abdelaziz of Nevada and John Wilson of Lynnfield, Massachusetts. Do you know either of these individuals?

Yes _____ No _____

If yes, please describe who you know and how you know them.

36. Attached to this questionnaire as Attachment A is a list of people who may be involved in this trial. Do you personally know any of those people?

Yes _____ No _____

If yes, please describe who you know and how you know them.

37. Do you, a relative, a close friend, and/or anyone you live with have a personal affiliation with the University of Southern California, Harvard University, Stanford University, the College Board, Educational Testing Services, or ACT Inc.?

Yes _____ No _____

If yes, please explain:

38. Have you, an immediate family member, a grandchild, and/or anyone you live with:

a. Played sports in college?

Yes _____ No _____

If yes, identify the school and sport:

b. Worked with or for a college counseling service to help a child prepare for college (e.g., academic planning, extracurricular development, standardized exam preparation, college counseling, etc.)?

Yes _____ No _____

If yes, please explain:

c. Been employed by any college or university?

Yes _____ No _____

If yes, identify the school and position:

d. Made a donation or contribution to a college or university?

Yes _____ No _____

If yes, explain, stating the school, amount, and fund or program that received the donation:

- e. Worked in fundraising for any organization?

Yes _____ No _____

If yes, please explain:

39. This case has been referred to by the media as “Varsity Blues” or the “college admissions” case. Have you read any articles or books, watched any news, read any information in websites or news feeds on the internet, or viewed other media coverage, such as a documentary, related to this case?

Yes _____ No _____

If yes, please list any books you have read or television shows or documentaries you have watched:

Describe the amount of media coverage you have seen about this case:

_____ None (have not heard of this case before today)

_____ A little (basically just heard that it exists)

_____ A moderate amount (just basic coverage in the news)

_____ A lot (sought out and read many articles and/or watched accounts on TV or online)

40. Have you ever commented on this case, sometimes referred to as the so-called “college admissions” or “Varsity Blues” case, in a blog post, article, on social media, or any other forum?

Yes _____ No _____

If yes, please explain:

41. Are you aware of any preconceived views or prejudice that you may have against the government or the defendants that would in any way impair your ability to evaluate and judge fairly and impartially the facts of this case?

Yes _____ No _____

If yes, please explain:

42. Several witnesses in this case cooperated with the government in the hope of receiving a more lenient sentence. Would that fact make it more difficult for you to fairly and impartially consider their testimony?

Yes _____ No _____

If yes, please explain:

43. Do you have any opinions about wealthy and/or successful people that would impact your ability to decide this case impartially on the evidence presented and the law as stated by the Court?

Yes _____ No _____

If yes, please explain:

44. The defendants in a criminal case have an absolute right not to testify. Would you hold it against the defendants if they did not testify in this case?

Yes _____ No _____

If yes, please explain:

45. As a juror, you would be barred from reading or watching media accounts of the trial, consulting external sources, and discussing the case with other people. The judge may order you to refrain from using social media for the duration of the trial. Do you have any reservations or concerns about your ability or willingness to abide by these rules?

Yes _____ No _____

If yes, please explain:

46. Do you have any religious, ethical, moral or philosophical beliefs that would make it difficult for you to sit in judgment on another person in a court of law?

Yes _____ No _____

If yes, please explain:

47. Did you have any problems reading and understanding this questionnaire?

Yes _____ No _____

If yes, please explain:

48. Is there any other matter or any information you feel that the judge or attorneys should know about you, not covered by this questionnaire? Do you have any concerns that have been raised by the experience of filling out this questionnaire that might affect your ability to sit as a juror, or anything else that you feel we should know about? If so, please explain.

49. Is there anything about your responses to any of the questions in this questionnaire, or anything else in your background, experience, employment, training, education, knowledge, or beliefs that might affect your ability to be a fair and impartial juror?

JUROR CERTIFICATION

I do hereby certify, under the pains and penalties of perjury, that I had no assistance in completing this questionnaire and the answers that I have given in this questionnaire are true and complete to the best of my knowledge and belief.

Signature: _____

Print Name: _____

Date: _____

ATTACHMENT A

- | | | |
|-----------------------|------------------------|----------------------------|
| 1. Abdelaziz, Gamal | 23. Hernandez, Roman | 44. Rosselli, David |
| 2. Abdelaziz, Sabrina | 24. Hubbs, Daniel | 45. Sanford, Mikaela |
| 3. Beaulaurier, Joe | 25. Hughes, Aaricka | 46. Schuette, Kurt |
| 4. Bowen, Jack | 26. Isackson, Bruce | 47. Sencabaugh, Alison |
| 5. Bradshaw, Kelsey | 27. Isackson, Davina | 48. Simon, Scott |
| 6. Brennan, Kirk | 28. Jacobson, Scott | 49. Singer, William "Rick" |
| 7. Brown, Keith | 29. Janke, Laura | 50. Smith, Laura |
| 8. Brunold, Timothy | 30. Keating, Elizabeth | 51. Speier, Rick |
| 9. Cedrone, Kaitlyn | 31. Loftus, Brendan | 52. Tierney, William |
| 10. Chassin, Rebecca | 32. Lopes, Steven | 53. Tiss, David |
| 11. Checcio, Albert | 33. Mandel, Mark | 54. Velakacharla, Nitya |
| 12. Crawford, Ron | 34. Masera, Steven | 55. Verronneau, Steven |
| 13. Deckett, Mark | 35. McKay, John Jr. | 56. Wandzilak, Scott |
| 14. DeMaio, Jeffrey | 36. Mericle, Andrew | 57. White, Paul |
| 15. Felaya, Amal | 37. Moon, Casey | 58. Whittam, Lauren |
| 16. Garcia, Jon | 38. Nahmens, James | 59. Wilson, Courtney |
| 17. Garfio, Alejandro | 39. Orr, Ronald | 60. Wilson, John B. |
| 18. George, Lauren | 40. Pintaric, Marko | 61. Wilson, John B. Jr. |
| 19. Gonzales, Ray | 41. Ranahan, Colleen | 62. Wilson, Leslie |
| 20. Haden, Patrick C. | 42. Reisman, Alexandra | 63. Wilson, Mary |
| 21. Hardan, Antonio | (Bitterlin) | 64. Woodbridge, Jessica |
| 22. Heinel, Donna | 43. Rogers, Debbie | 65. Zambri, Christopher |